

LAW OFFICES OF
WILLIAM J. FRANKLIN,
CHARTERED

1919 PENNSYLVANIA AVENUE, N.W.
SUITE 300
WASHINGTON, D.C. 20006-3404

FILE COPY ORIGINAL
(202) 736-2233
TELECOPIER (202) 452-8757
AND (202) 223-6739

June 20, 1994

Mr. William F. Caton
Acting Secretary,
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D. C. 20554

Via Messenger

Re: **GN Docket No. 93-252**
Implementation of Sections 3(n) and 332
of the Communications Act
Regulatory Treatment of Mobile Services

Dear Mr. Caton:

Submitted herewith on behalf of LegalCom Services, Inc. are an original plus ten (10) copies of its Comments with respect to the above-referenced docket.

Kindly contact my office directly with any questions concerning this submission.

Respectfully submitted,

William J. Franklin

William J. Franklin
Attorney for LegalCom
Services, Inc.

Encs.

cc: LegalCom Services, Inc.

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List A B C D E

Of 10

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Implementation of Sections 3(n))	GN Docket No. 93-252
and 332 of the Communications)	
Act)	
)	
Regulatory Treatment of)	
Mobile Services)	

To: The Commission

**COMMENTS OF
LEGALCOM SERVICES, INC.**

LegalCom Services, Inc. ("LegalCom"), by its attorney and pursuant to Section 1.415(b) of the Commission's Rules, hereby files Comments with respect to the Further Notice of Proposed Rulemaking adopted in the above-captioned proceeding.^{1/}

LegalCom urges the Commission to adopt procedures and policies which will permit and facilitate the filing of third-party, computer-generated FCC Form 600 applications.

INTEREST OF LEGALCOM

LegalCom produces commercial software to assist applicants for FCC authorizations, and their engineers and attorneys, in preparing the technical portion of their applications. Among LegalCom's products is its highly acclaimed PC401 software, which produces computer-generated versions of FCC Form 401. PC401 has been certified by the Commission as producing an acceptable

^{1/} 9 FCC Rcd ____ (FCC 94-100, released May 20, 1994) ("FNPRM").

substitute for FCC Form 401 since 1986. Attachment A hereto is a partial sample of a PC401-produced Form 401, showing its high quality and duplication of the FCC's form.

**THE COMMISSION SHOULD ADOPT PROCEDURES WHICH FACILITATE
THE PRODUCTION OF COMPUTER-GENERATED VERSIONS OF FCC FORM 600.**

LegalCom's computer-generated FCC Form 401 is one of numerous computer-generated editions of FCC Form 401 which the Commission has certified as acceptable, and which are filed every day with the Mobile Services Division. Applicants, attorneys, and engineers have found that the use of computer-generated forms -- whether LegalCom's or any of the other products -- facilitates the production of accurate FCC Form 401 applications. This, in turn, serves the public interest by reducing processing time.

The Commission should carry this practice forward with its proposed FCC Form 600. The following actions should be taken:

- The FCC Form 600 should be on 8½"x11" paper, and not use carbons, NCR paper, or any other printing technology incompatible with laser printers.
- The Commission should articulate objective standards which any computer-generated FCC Form 600 must meet. LegalCom (likely as well as most other vendors) would be willing to work informally with the Commission staff to assist in the development of such standards.
- The Commission should establish procedures by which computer-generated FCC Forms 600 meeting its standards can be certified as acceptable.
- The Commission should adopt rules which deem certified, computer-generated substitute FCC Form 600 fully substitutable with the Commission-supplied forms.

Adoption of these procedures will serve the public interest.

CONCLUSION

Accordingly, LegalCom Services, Inc. respectfully requests that the Commission adopt procedures and policies which will permit and facilitate the filing of third-party, computer-generated FCC Form 600 applications.

Respectfully submitted,

LEGALCOM SERVICES, INC.

By: William J. Franklin
William J. Franklin
Its Attorney

WILLIAM J. FRANKLIN, CHARTERED
1919 Pennsylvania Avenue, N.W.
Suite 300
Washington, D.C. 20006-3404
(202) 736-2233
(202) 452-8757 Telecopier

FCC Form 401
January 1993FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554Approved by OMB
3060-0046
Expires 10/31/95FCC Use Only
File Number
Call SignApplication for New or Modified Common Carrier
Radio Station Authorization Under Part 22Schedule A
Complete One Schedule A Per Application

1(a) Does this application refer to an existing station? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO If "YES," give Call Sign: _____	2(a) Fee Submitted \$ 230
(b) Is this an amendment to a pending application? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO If "YES," give File No.: _____	(b) No. of separate sites requested in this application 1

3. Name of Applicant. Indicate the name, mailing address and telephone number of the applicant. (For Subsidiary Communications Authorizations, see Instruction No. 8(C).)

Legal Name of Applicant (if person, list last name first)
Sample Cellular Telephone CompanyAssumed Name Used for Doing Business (if any)
Cellular One of SampleMailing Street Address or P.O. Box, City, State and ZIP Code
123 Main Street Sample City, TX 61234Area Code - Telephone No.
(713) 913-2345

4. Contact Representative. Indicate the name, mailing address and telephone number of person to contact, if other than applicant.

Name (last name first)
William J. FranklinFirm or Company Name
William J. Franklin, CharteredMailing Street Address or P.O. Box, City, State and ZIP Code
1919 Pennsylvania Avenue, N.W. Suite 30 Washington, DC 20006-3404Area Code - Telephone No.
(202) 736-2233

6. Type of Service (Mark "X" One)

- A. ☐ One-Way (Except Subsidiary Communications Authorization)
- B. ☒ Two-Way
- C. ☐ Both One-Way and Two-Way
- D. ☐ One-Way (Subsidiary Communications Authorization)
- Will Broadcast facilities be leased? ☐ YES ☐ NO
If "YES," submit as Exhibit _____,
the name and address of the proposed lessee.

7. Nature of Service

- A. ☐ Public Land Mobile Service (Other than Air-Ground Radio Telephone Service)
- B. ☒ Domestic Public Cellular Radio Telecommunications Service
Specify Market No. and Block below:
300A
- C. ☐ Offshore Radio Service
- D. ☐ Rural Radio Service
- E. ☐ Air-Ground Radiotelephone Service
- F. ☐ Developmental (Attach as Exhibit _____ a narrative statement in support of the request. (See 47 CFR 22, Subpart F))

8. Carrier Type

- A. ☒ Radio Common Carrier B. ☐ Wireline Common Carrier

9. Control points - Table MOB - 1A: to be completed for control points which are initial, additional or deleted. In Column (B) use the following symbols to specify status: I=Initial; A=Additional; D=Deleted.

(A) Location (Street Address, City or Town and State)	(B) I, A or D	FCC Use Only Control Point No.
123 Main Street, Sample City, TX	D	

- Table MOB - 1B: to be completed for control points which are to be relocated. Give the present location first, followed by the proposed location.

Location (Street Address, City or Town and State)	FCC Use Only Location No.
1. Present Location: 329 Walnut Street, Burtonsville, Ohio	
Proposed Location 456 Poplar Blvd., Burtonsville, Ohio	
2. Present Location	
Proposed Location	

10. Applicant is: (Mark "X" One) A. <input type="checkbox"/> Individual B. <input type="checkbox"/> Partnership C. <input type="checkbox"/> Unincorporated Association D. <input checked="" type="checkbox"/> Corporation		11. If applicant is a corporation (including joint stock companies) identify the state or country laws under which it is organized. <div style="text-align: center;">Texas</div>					
Place an "X" in the appropriate columns.						YES	NO
12. Does the applicant certify that it complies with Section 310(b) of the Communications Act of 1934, as amended, and Section 22.4 of the Commission's Rules regarding alien ownership and control? If "NO," attach as Exhibit <u>DNA</u> a statement describing applicant's ownership and control by aliens.						X	
13. Is applicant directly or indirectly controlled by any other corporation? If "YES," give names and addresses of all such other corporations, including organization having ultimate control, in Exhibit <u>DNA</u> .							X
14. Has applicant or any party to this application had any FCC station license or permit revoked or had any application for permit, license or renewal denied by this Commission? If "YES," attach as Exhibit <u>DNA</u> a showing giving the call sign of license or permit revoked and relate circumstances.							X
15. Has any court finally adjudged the applicant, or any person directly or indirectly controlling the applicant, guilty of unlawfully monopolizing or attempting unlawfully to monopolize radio communications, directly or indirectly, through control of manufacture or sale of radio apparatus, exclusive traffic arrangement, or any other means or unfair methods of competition? If "YES," attach as Exhibit <u>DNA</u> a statement relating the facts.							X
16. Has the applicant, or any party to this application, or any person directly or indirectly controlling the applicant ever been convicted of a felony by any state or federal court? If "YES," attach as Exhibit <u>DNA</u> a statement relating the facts.							X
17. Is applicant, or any person directly or indirectly controlling the applicant, presently a party in any pending matter referred to in Items 15 and 16? If "YES," attach as Exhibit <u>DNA</u> a statement relating the facts.							X
18. Is applicant directly or indirectly, through stock ownership, contract, or otherwise currently interested in the ownership or control of any other licensed radio stations or pending applications for radio stations under Part 22 within 40 miles of the station applied for here? (See Sections 22.13(a) of FCC Rules and Regulations.) If "YES," show, for each, call sign (if known), file no. (if pending), service, base station location (city and state), frequency and name of licensee in Exhibit <u>DNA</u> . (Item 18 does not apply to cellular applicants.)						DNA	
19. Has applicant been denied state certification for the facilities proposed in this application? If "YES," attach as Exhibit <u>DNA</u> , a statement describing the state authority's action and any pending appeals, or whether the state appeal process has been exhausted and attach copies of any relevant decisions.							X
20. Is this an application for one or more additional channels for which a loading study is required per Sections 22.16 and 22.516 of FCC Rules? If "YES," include required loading study as Exhibit <u>DNA</u> . In the same Exhibit, show data on held orders or from a valid statistical survey or any other materials which demonstrate that the public interest would be served by the grant of this application.							X
21. Is this application for more than one channel on a new system? If "YES," show, in Exhibit <u>DNA</u> , data on held orders or from a valid statistical survey or any other materials which demonstrate that the public interest would be served by the grant of this application.						DNA	
22. List below the Exhibits that are attached to this application.							
Exhibit Number	Sec. and/or Item No. of Rule or Form	Exhibit Number	Sec. and/or Item No. of Rule or Form	Exhibit Number	Sec. and/or Item No. of Rule or Form		
1	31, 37						
2	37(i), \$22.15(j)(4)						
3	37(j), \$22.15(b)(2)						
CERTIFICATION							
The APPLICANT waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because of the previous use of same, whether by license or otherwise, and requests an authorization in accordance with this application. All statements made in the attached exhibit are a material part hereof and are incorporated herein as if set out in full in this application. The undersigned, individually and for the applicant, hereby certifies that the statements made in this application are true, complete and correct to the best of his (her) knowledge and belief, and are made in good faith.							
WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. Code, Title 18, Section 1001) AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. Code, Title 47, Section 312(a)(1)) AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).		23. Date		24. Typed Name of Person Signing <div style="text-align: center;">John A. Sample</div>			
		25. Signature		26. Title (Position Held By Person Signing Application) <div style="text-align: center;">President</div>			